UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

DECLARATION OF SARA B.
TOMEZSKO IN SUPPORT OF
MOTION TO RETAIN DOCUMENTS
UNDER SEAL

I, SARA B. TOMEZSKO, subject to the penalties by law for perjury, do hereby declare the following to be true and correct on the basis of my personal knowledge. If called upon to do so, I would be competent to testify to the matters set forth in this declaration.

- 1. I am an associate at Paul Hastings LLP, a member in good standing of the Bar of the State of New York, and outside counsel for Defendant in this matter.
- 2. Attached to my declaration as Exhibit A is an unredacted copy of Google's Letter dated December 1, 2022 (ECF 265). Portions sought to be retained under seal have been identified with yellow highlighting.
- 3. Attached to my declaration as Exhibit B is a true and correct copy of the Order dated April 8, 2009, permitting parties to file confidential severance agreements under seal (ECF 57) in *Cancro v. Credit Agricole Indosuez Severance Pay Program*, No. 05 CIV. 2023 RJS (S.D.N.Y.), retrieved from the electronic docket using the PACER System.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

Signed on the 2nd day of December, 2022 in New York, New York.

Sara Tomezsko